

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND DIVISION

In re: ) Case No. 17-12667-jps  
Arlo H. Hall )  
aka Arlo H McGhee ) Chapter 13  
Bynetta R. Hall )  
Debtors. ) Judge JESSICA E. PRICE SMITH  
 )  
 ) LATE PRELIMINARY RESPONSE TO  
 ) OBJECTION TO NOTICE OF  
 ) PAYMENT CHANGE [D.E. 111]  
 )  
 ) ADDRESS OF REAL PROPERTY:  
 ) 150 CREEKSIDE DR  
 ) MAPLE HEIGHTS, OH 44137

COMES NOW, Nationstar Mortgage LLC d/b/a Mr. Cooper as servicer for U.S. Bank National Association, not in its individual capacity but solely as Trustee for the NRZ Pass-Through Trust VII (NPL) (“Secured Creditor”), and files this written response to Objection to Notice of Mortgage Payment Change [D.E. 111], and as grounds therefore states:

1. Nationstar Mortgage LLC d/b/a Mr. Cooper as servicer for U.S. Bank National Association, not in its individual capacity but solely as Trustee for the NRZ Pass-Through Trust VII (NPL) is a secured creditor for Claim 19-1 in the instant case reflecting a secured claim against the Debtor’s property, 150 Creekside Drive, Maple Heights, OH 44137, in the amount of \$160,441.29.

2. On January 27, 2020, the Secured Creditor filed a Notice of Mortgage Payment Change which changed the Debtors’ payment from \$1,651.54 to \$2,765.84, effective April 1, 2020 pursuant to an Escrow Account Disclosure Statement dated January 8, 2020.

4. On April 6, 2020, the Debtors filed this instant an Objection to Notice of Mortgage Payment Change filed by Secured Creditor [D.E. 111].

5. The Notice of Objection to Mortgage Payment Change was filed on April 6, 2020 and indicated the deadline to respond was April 29, 2020. The filing Counsel of the Secured Creditor missed the Response Deadline due to a calendaring issue. The Secured Creditor, by and through the undersigned counsel, respectfully requests to allow this late filed Response to be treated as timely filed. Secured Creditor requests that the deadline to Respond be extended through and including April 30, 2020. The Debtor is not prejudiced by the extension of time herein requested.

6. The Secured Creditor needs additional time to review its records to respond to the statements contained in the Objection to Notice of Mortgage Payment Change. Secured Creditor reserves the right to supplement its response.

Respectfully submitted,

/S/ Seth Greenhill  
Seth Greenhill, Esq.  
Ohio Bar # 99380  
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*Attorney for Creditor*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was forwarded by either ECF Noticing or Regular U.S. Mail on April 30, 2020.

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Jonathan I. Krainess  
\*\*electronic notification\*\*

Lauren A. Helbling  
\*\*electronic notification\*\*

And by regular U.S. mail, postage prepaid, on:

Arlo H. Hall, Debtor, 150 Creekside Drive, Maple Heights, OH 44137  
Bynetta R. Hall, Co-Debtor, 150 Creekside Drive, Maple Heights, OH 44137

PADGETT LAW GROUP

/S/ Seth Greenhill  
Seth Greenhill, Esq. (#99380)